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MONTEREY REGIONAL WASTE MANAGEMENT DISTRICT

Home of the Last Chance Mercantile

March 26, 2009

Via Email (rboyd@arb.ca.gov) and Regular Mail

Mr. Richard Boyd, Manager
California Air Resources Board
1001 I Street
PO Box 2815
Sacramento, CA 95812

Re: Comments Regarding Draft Proposed Regulation Order – Surface Emissions of Methane from Municipal Solid Waste (MSW) Landfills (3/18/09)

Dear Mr. Boyd:

This letter provides comments from the Monterey Regional Waste Management District (MRWMD) on the Draft proposed regulation order for the control of methane emissions from MSW landfills in California (March 18, 2009).

1. **Establish an Instantaneous Surface Emissions Limit at 500 ppmv.** Reducing the landfill surface emissions standard for methane from the present 500 ppmv industry standard to 200 ppmv is too drastic a reduction before understanding the operational impacts of such a regulation. A threshold of 500 ppmv is adequate and will provide a significant methane reduction.
2. **Establish a 100-foot Monitoring Grid.** The requirement to perform the surface emissions monitoring sweep on 25-foot centers is unreasonable and costly, with little perceived benefit for the additional cost. Establishment of a 100-foot monitoring grid is more than adequate to characterize landfill surface emissions. Even at 100-foot centers, walking this path at the Monterey Peninsula Landfill on a quarterly basis is a costly, labor-intensive mandate. Monitoring at all pipe penetrations, where problems are more likely to occur, provides a better way to limit methane emissions than to require a 25-foot monitoring grid.
3. **Establish a Corrective Action Response Time at Ten Days.** The requirement to correct surface emissions violations within five calendar days is unrealistic. In inclement weather this can be difficult to comply with. We suggest that the existing NSPS standard of ten calendar days be used, as the benefit in shortening the response time is unproven.

Mr. Richard Boyd

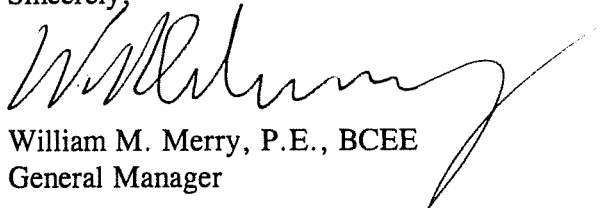
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The MRWMD shares the goal of reducing greenhouse gas (GHG) emissions, but we encourage a flexible approach that allows local government to be able to prioritize the most effective approaches. The above revisions will make implementation of the rule more workable and less costly for the regulated community, while still preserving GHG reduction benefits.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Merry", with a long, sweeping flourish extending to the right.

William M. Merry, P.E., BCEE
General Manager

cc: MRWMD Board of Directors